

JONATHAN H. BLAVIN, SBN 230269
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: Jonathan.Blavin@mto.com

ROSE L. EHLER, SBN 296523
VICTORIA A. DEGTYAREVA, SBN 284199
FAYE PAUL TELLER, SBN 343506
ARIEL T. TESHUVA, SBN 324238
LAURA M. LOPEZ, SBN 313450
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: Rose.Ehler@mto.com
Email: Victoria.Degtyareva@mto.com
Email: Faye.Teller@mto.com
Email: Ariel.Teshuva@mto.com
Email: Laura.Lopez@mto.com

Attorneys for Snap Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

THIS DOCUMENT RELATES TO ALL
ACTIONS

**DECLARATION OF LAURA M. LOPEZ
IN SUPPORT OF OMNIBUS SEALING
STIPULATION (MARCH 3, 2025 ORDER
RESOLVING PRIVILEGE
DETERMINATION AS TO FOURTEEN
SNAP DOCUMENTS)**

Judge: Honorable Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

DECLARATION OF LAURA M. LOPEZ

I, Laura M. Lopez, declare and state as follows:

1. I am an attorney with the law firm Munger, Tolles and Olson and represent Snap Inc. (“Snap”) in the above-captioned case. This declaration is based on my personal knowledge. If called upon to do so, I could and would competently testify as follows.

2. The five exhibits referenced in the following chart are true and correct copies of the documents bearing the Bates numbers reflected in the chart. Redacted versions of these exhibits, along with other exhibits not at issue here, were previously filed under seal and unredacted versions were lodged with the Court for in camera review in connection with the Parties’ January 14, 2025 Joint Letter Brief Regarding Snap’s Assertion of Privilege in Connection with 14 Redacted Documents (ECF No. 1547). The Court granted the Parties’ Omnibus Stipulation to Seal those exhibits in their entirety (ECF Nos. 1550, 1635, 1660).

3. In connection with the Court’s March 3, 2025 Order Resolving Privilege Determination As To Fourteen Snap Documents (“March 3, 2025 Order”) (ECF No. 1732), the Court attached the five exhibits at issue with corrected redactions for attorney-client and work-product privilege.

4. Pursuant to the Court’s March 3, 2025 Order, Snap produced to Plaintiffs the five exhibits at issue bearing the redactions as indicated by the Court.

5. I have reviewed the documents Snap seeks to seal pursuant to the Court’s Order Setting Sealing Procedures (ECF No. 341). Based on my review of the March 3, 2025 Order and the five exhibits at issue in consultation with Snap, I understand there is good cause to seal the following information:

Document	Basis for Sealing
Snap’s Exhibit B Bates: SNAP6913291 ECF No. 1732-1	This exhibit contains sensitive and confidential information about Snap’s internal ad review practices, advertising and business strategies, relationships with advertising partners, lens product development, and public relations strategies. Disclosure of this information would provide competitors with insight into Snap’s business that they would not otherwise have and thereby cause competitive harm to Snap.

Document	Basis for Sealing
Snap's Exhibit D Bates: SNAP6928318 ECF No. 1732-2	This exhibit contains sensitive and confidential information about Snap's internal moderation practices and business strategies. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit F Bates: SNAP6955026 ECF No. 1723-3	This exhibit contains sensitive and confidential information about Snap's internal policy enforcement mechanisms, account investigation practices, and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit G Bates: SNAP6960749 ECF No. 1732-4	This exhibit contains sensitive and confidential information about Snap's internal investigation practices and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.
Snap's Exhibit H Bates: SNAP6969803 ECF No. 1732-5	This exhibit contains sensitive and confidential information about Snap's internal investigation practices, cooperation with law enforcement investigations, and media and communications strategies. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on March 28, 2025.

By: /s/ Laura M. Lopez
LAURA M. LOPEZ